

1990



☐ VIOLATION☐ VIOLATIC FOLLOWUPDP-
4/9/90☒ Add
☐ Change
☐ DeleteINVESTIGATION/VIOLATION FORM
(BOLDFACED ITEMS ARE REQUIRED)DISTRIBUTION:
Blue - Region/Local Program
Canary - Data Entry/Region
Pink - Investigator/Data Entry

Account Number 610118V Account Name: Hercules Offshore
Date of Investigation (as MMDDYY) 10.17.89 Off Hours (Y or N) ---
Investigator Staffcode HAK1 Permit(s): ---
Primary Investigator Juriscode --- Other Juriscode 1 --- Other Juriscode 2 ---
Site Name/Location: 904 Martin Lane
Person Contacted/Phone: Lupe Bustos

Investigation Number 337114A Related Previous Investigation Number ---
Federal Program (Y or N): NSPS NESHAP Situation Number --- (COMPLIANCE DIV. ONLY)
Investigation Type COSU In-House Investigation (Y or N) --- *EPN ---
Comment Inv. in response to multiple complaint # 278900343

36

*** FOR RECORDING REVIEWS OF COMPANY-SUBMITTED REPORTS ONLY ***

Date Test Conducted (as MMDDYY) --- Date Report Received (as MMDDYY) ---
Analysis Review Results (C,N,U) --- Permit(s): --- Retest Required? ---

Investigation Number --- Related Previous Investigation Number ---
Federal Program (Y or N): NSPS NESHAP Situation Number --- (COMPLIANCE DIV. ONLY)
Investigation Type --- In-House Investigation (Y or N) --- *EPN ---
Comment ---

Investigation Number --- Local Ordinance (Y or N) ---
Violation Number --- (CHANGES/DELETES ONLY) Situation Number --- (COMPLIANCE DIV. ONLY)
Cause/Description --- (COMPLIANCE DIV. ONLY)
Rule Violated --- Contamcode ---

Fill in the Following Applicable Items:

Permit Number --- Permit Provision ---
Board Order Number --- Court Order Number --- CFR Part ---
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*EPN REQUIRED FOR INVESTIGATION TYPES INDICATED ON BACK WITH AN *

*FIN REQUIRED FOR VOC VIOLATIONS AS INDICATED WITH A + IN THE USER'S MANUAL RULE TABLE

Investigator Signature: Mary A. Knuth Date: 1/2/90
Approved By: Robert F. Burt Date: 1/15/90
Screen ID: IV1, IV11, VLI Page 1 of --- Pages ACB 93A (12/1/87)

T & E 000149

Investigator's Comments
Hercules Offshore Inc.
Freeport, Brazoria County
Investigation No. 337114A

BL-0118-V
10/17/98
Page 5

Purpose: This investigation was conducted in response to multiple complaint No.078900336 (7 complaints) alleging nuisance due to odors and dust from the cleaning and sandblasting of barges at the Hercules Offshore barge refurbishing facility. The complaints were received by telephone at the regional office on dates between October 9 and 16, 1989 (see attached complaint copies).

Background: On August 9, 1989 a complaint investigation was conducted in response to a complaint of nuisance dust and odors from Hercules Offshore facility. A Notice of Violation was issued to Hercules for Board General Rule 101.4, which consisted of nuisance due to dust from the sandblasting of a barge. No odors were detected at the time of the investigation. The company responded by stating that no sandblasting would be conducted at the facility when the wind is out of the east. The violation was resolved with no further action.

Investigative Findings: At approximately 10:30 a.m. on October 17, 1989, I met with Mr. Robby Blair, City of Freeport, and Mr. Floyd Bell, Brazoria County Health Department, at the Freeport administration building at 128 East 4th Street (Mr. Obi Odiakosa of the TACB Houston office was also present). Mr. Blair had requested that he accompany me on the complaint investigation. We discussed the status of the numerous complaints received from the Bridge Harbor community regarding the Hercules facility. I informed Mr. Blair and Mr. Bell that, although we had received numerous complaints, only one recent violation was documented by TACB (August 9, 1989, Rule 101.4, Nuisance dust from sandblasting). I explained the grandfathered and permit status of the facilities of the operation. I also explained which Board regulations would be applicable to the Hercules operation. Mr. Blair reviewed the results of complaint investigations conducted by the City of Freeport and Brazoria County and provided me with copies of his reports, as well as some other pertinent information (see attached information). No complaints were confirmed by Mr. Blair. Mr. Blair expressed his desire to resolve the situation as soon as possible.

At approximately 11:10 a.m., we arrived in the vicinity of the complainants' residences and the Hercules Offshore facility (Mr. Blair and Mr. Bell in Mr. Blair's truck and Mr. Odiakosa and I in a state vehicle). Hercules was operating; sandblasting was being conducted. The wind was from a southwesterly direction at approximately 3 to 7 mph. An odor survey was conducted. No nuisance odors were detected.

Investigator's Comments
Hercules Offshore Inc.
Freeport, Brazoria County
Investigation No. 337114A

BL-0118-V
10/17/98
Page 5

Following the area survey a visit was made to the Hercules facility where we met with Mr. Lupe Bustos, Production Supervisor. Mr. Bustos was informed of the complaints against the facility and was asked if he was aware of any incidents that may have resulted in the alleged conditions. Mr. Bustos stated that he was not aware of any unusual conditions. I asked him if he could review the type of work conducted at the site from 10/8/89 to 10/15/89. Mr. Bustos and Mr. Juan Gonzales, Barge Cleaning Foreman, and I reviewed company records. Recorded were the following activities:

<u>Date</u>	<u>Type of Work</u>	<u>Location</u>
10/8	Cleaned barge (trichloroethane) Sandblasted/Painting barge	Dock #4 Ways
10/9	Sandblasted 2 barges Sandblasted/Painting barge	Ways East end
10/10	Sandblasted/Painting barge Sandblasted/Painting one barge	East end Ways
10/11	Cleaned barge (acetone) Sandblasted/Painting 2 barges	Dock #4 Ways
10/12	Cleaned barge (propylene glycol ether, antifreeze)	Dock #4
10/13	Cleaned barge (lube oil) Sandblasted/Painting one barge	Dock #4 Ways
10/14	No work done	
10/15	Cleaned barge (caustic)	Dock #4
10/16	No work done	
10/17	Cleaned barge (Formaldehyde)	Dock #4

Following our discussion Mr. Bustos and Mr. Gonzales provided me with a tour of the plant. Upon inspection of the facility there were no apparent violations found.

Investigator's Comments
Hercules Offshore Inc.
Freeport, Brazoria County
Investigation No. 337114A

BL-0118-V
10/17/98
Page 7

Conclusion: There were no nuisance conditions observed at the time of this investigation, however there does appear to be a significant potential for nuisance conditions due to the manner in which the painting, sandblasting and cleaning are conducted. Routine area surveillance is recommended to be continued. Source sampling has been requested and approved to confirm compliance.

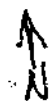
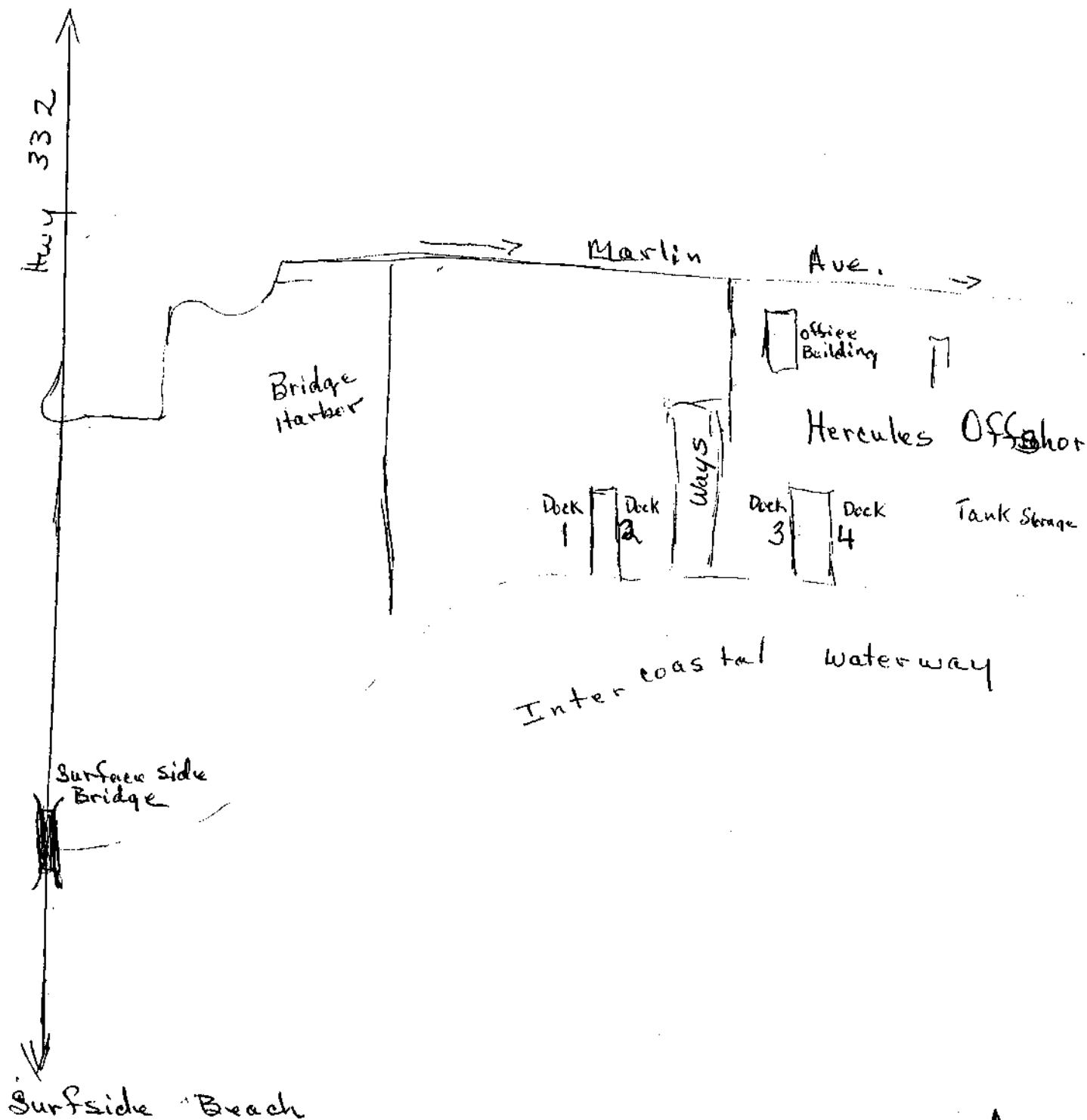
Mary A. Knotts

Mary A. Knotts
Environmental Quality Specialist
Region 7

Filename: 11897114.MAK

cc: Mr. Robby Blair, Building Official, City of Freeport,
128 East 4th Street, Freeport, Tx. 77541

Free port



Not to scale

Mary Knotts
1/2/89

T&E 000153

VIOLATION

VIOLATION FOLLOWUP

- ☒ Add
☐ Change
☐ Delete

INVESTIGATION/VIOLATION FORM (BOLDFACED ITEMS ARE REQUIRED)

DISTRIBUTION:
Blue - Region/Local Program
Canary - Data Entry/Region
Pink - Investigator/Data Entry

Account Number 610118 V Account Name: Hereules Offshore
Date of Investigation (as MDDYY) 10.17.89 Off Hours (Y or N) ---
Investigator Staffcode MAK1 Permit(s): ---
1 Primary Investigator Juriscode --- Other Juriscode 1 --- Other Juriscode 2 ---
Site Name/Location: 904 Martin Lane
Person Contacted/Phone: Lupe Baustos

Investigation Number 337114A Related Previous Investigation Number ---
Federal Program (Y or N): NSPS NESHAP Situation Number --- (COMPLIANCE DIV. ONLY)
Investigation Type OSU In-House Investigation (Y or N) --- *EPN ---
Comment Inv. in response to multiple complaint # 078900345

36

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*FIN REQUIRED FOR VOC VIOLATIONS AS INDICATED WITH A + IN THE USER'S MANUAL RULE TABLE

Investigator Signature: Mary A. Knuth Date: 1/2/80

Approved By: Robert F. Baustos Date: 1/15/89

Screen ID: IV1, IV11, VLI

Page 1 of --- Pages

T&E 000439

ACB 93A (12/1/

Investigator's Comments
Hercules Offshore Inc.
Freeport, Brazoria County
Investigation No. 337114A

BL-0118-V
10/17/98
Page 5

Purpose: This investigation was conducted in response to multiple complaint No.078900336 (7 complaints) alleging nuisance due to odors and dust from the cleaning and sandblasting of barges at the Hercules Offshore barge refurbishing facility. The complaints were received by telephone at the regional office on dates between October 9 and 16, 1989 (see attached complaint copies).

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Investigative Findings: At approximately 10:30 a.m. on October 17, 1989, I met with Mr. Robby Blair, City of Freeport, and Mr. Floyd Bell, Brazoria County Health Department, at the Freeport administration building at 128 East 4th Street (Mr. Obi Odiakosa of the TACB Houston office was also present). Mr. Blair had requested that he accompany me on the complaint investigation. We discussed the status of the numerous complaints received from the Bridge Harbor community regarding the Hercules facility. I informed Mr. Blair and Mr. Bell that, although we had received numerous complaints, only one recent violation was documented by TACB (August 9, 1989, Rule 101.4, Nuisance dust from sandblasting). I explained the grandfathered and permit status of the facilities of the operation. I also explained which Board regulations would be applicable to the Hercules operation. Mr. Blair reviewed the results of complaint investigations conducted by the City of Freeport and Brazoria County and provided me with copies of his reports, as well as some other pertinent information (see attached information). No complaints were confirmed by Mr. Blair. Mr. Blair expressed his desire to resolve the situation as soon as possible.

At approximately 11:10 a.m., we arrived in the vicinity of the complainants' residences and the Hercules Offshore facility (Mr. Blair and Mr. Bell in Mr. Blair's truck and Mr. Odiakosa and I in a state vehicle). Hercules was operating; sandblasting was being conducted. The wind was from a southwesterly direction at approximately 3 to 7 mph. An odor survey was conducted. No nuisance odors were detected.

Following the area survey a visit was made to the Hercules facility where we met with Mr. Lupe Bustos, Production Supervisor. Mr. Bustos was informed of the complaints against the facility and was asked if he was aware of any incidents that may have resulted in the alleged conditions. Mr. Bustos stated that he was not aware of any unusual conditions. I asked him if he could review the type of work conducted at the site from 10/8/89 to 10/15/89. Mr. Bustos and Mr. Juan Gonzales, Barge Cleaning Foreman, and I reviewed company records. Recorded were the following activities:

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Following our discussion Mr. Bustos and Mr. Gonzales provided me with a tour of the plant. Upon inspection of the facility there were no apparent violations found.

Investigator's Comments
Hercules Offshore Inc.
Freeport, Brazoria County
Investigation No. 337114A

BL-0118-V
10/17/98
Page 7

Conclusion: There were no nuisance conditions observed at the time of this investigation, however there does appear to be a significant potential for nuisance conditions due to the manner in which the painting, sandblasting and cleaning are conducted. Routine area surveillance is recommended to be continued. Source sampling has been requested and approved to confirm compliance.

Mary A. Knotts

Mary A. Knotts
Environmental Quality Specialist
Region 7

Filename: 11897114.MAK

cc: Mr. Robby Blair, Building Official, City of Freeport,
128 East 4th Street, Freeport, Tx. 77541

T&E000442

☒ VIOLATION

☐ VIOLATION FOLLOWUP

DP
4/9/90

- ☒ Add
☐ Change
☐ Delete

INVESTIGATION/VIOLATION FORM
(BOLDFACED ITEMS ARE REQUIRED)

DISTRIBUTION:
Blue - Region/Local Program
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Account Number 6L0118V Account Name: Hercules Offshore
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Investigator Signature: Mary A. Knott Date: 1/2/90

Approved By: Robert F. Burt Date: 1/15/90

Screen ID: IV1, IV11, V11 Page 1 of 1 Pages R&E 000434 ACB 93A (12/1/87)

Investigator's Comments
Hercules Offshore Inc.
Freeport, Brazoria County
Investigation No. 337114A

BL-0118-V
10/17/98
Page 5

Purpose: This investigation was conducted in response to multiple complaint No.078900336 (7 complaints) alleging nuisance due to odors and dust from the cleaning and sandblasting of barges at the Hercules Offshore barge refurbishing facility. The complaints were received by telephone at the regional office on dates between October 9 and 16, 1989 (see attached complaint copies).

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T&E 000435

Investigator's Comments
Hercules Offshore Inc.
Freeport, Brazoria County
Investigation No. 337114A

BL-0118-V
10/17/98
Page 5

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10/16	No work done	
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Following our discussion Mr. Bustos and Mr. Gonzales provided me with a tour of the plant. Upon inspection of the facility there were no apparent violations found.

T&E 000436

Investigator's Comments
Hercules Offshore Inc.
Freeport, Brazoria County
Investigation No. 337114A

BL-0118-V
10/17/98
Page 7

Conclusion: There were no nuisance conditions observed at the time of this investigation, however there does appear to be a significant potential for nuisance conditions due to the manner in which the painting, sandblasting and cleaning are conducted. Routine area surveillance is recommended to be continued. Source sampling has been requested and approved to confirm compliance.

Mary A. Knotts

Mary A. Knotts
Environmental Quality Specialist
Region 7

Filename: 11897114.MAK

cc: Mr. Robby Blair, Building Official, City of Freeport,
128 East 4th Street, Freeport, Tx. **37541**

Free port

Hwy 332

Bridge Harbor

Marlin Ave.

Office Building

Hercules Offshore

Dock 1

Dock 2

Way 5

Dock 3

Dock 4

Tank Storage

Inter coastal waterway

Surface Side Bridge

Surfside Beach

Not to scale

Mary Knotts
1/2/89

T&E 000438

TEXAS WATER COMMISSION
Investigation Report
District 7

Date Investigation Requested: 10/9/89

Source: Telephone
Investigation No. EF9004407

Name: Anonymous
Address: _____
City, State, Zip: _____
Telephone: _____

Type
Pollution, Surface Water _____
Pollution, Ground Water _____
Solid Waste X
Water Rights _____
Others _____

Location: Hercules Offshore Drilling Co., abandoned site on Lettie Street, off Telephone Road (see attachment 1).

Key Map Location: 575 W

Alleged Problem: The abandoned site is littered with partially empty drums and buckets containing oil and unknown chemicals.

Summary of Investigation: Ata ur Rahman inspected the site on October 10, 1989 and March 21, 1990. The site of Hercules Offshore Drilling Co. is littered with drums partially filled with oil and chemicals, used tires, discarded (see attached page for continuation).

X Interim Status of Corrective Action if problem is not yet resolved
Final Resolution of Problem: The facility is advised through the attached Notice of Violation dated April 9, 1990 to:

1. clean up the abandoned site on Lettie Street in compliance with 31 TAC 335.4 and Texas Water Code 26.266(a).
2. Update its Notice of Registration to reflect correct contact person, telephone number and mailing address.

Date and method of notification of person making request for assistance or complaint: N/A

County Harris Segment No. 1007

Stennie Meadows
Signature of Investigator
for Ata ur Rahman
Stennie A. Meadows
Stennie A. Meadows

River Basin San Jacinto TWC Reg No. 30141

Date: 3/22/90

SAM/AUR/t1

cc: John Ward

T&E 000419

Hercules in violation
in Houston before
moving to
Jreepert.

000000

Summary of Investigation (cont.):

equipment and other refuse. The soil within the facility is stained and appears to be contaminated with oil and other unknown chemicals (photographs 1-12. See attachment 3 for site map). Under 31 TAC 335.4 - General Prohibitions, the leaking drums and contaminated soil has created a nuisance and endangered the public health and welfare. Additionally, the runoff and seepage from this facility has caused an imminent threat of discharge and industrial solid waste to the waters of the State. The facility has failed to remove the contaminated soil, resulting from the spills (Texas Water Code 26.266). Record review of the facility indicated that the Notice of Registration (NOR) lists incorrect telephone number, mailing address and the contact person (see NOR).

The current contact information for Hercules Offshore Drilling Co. is noted below:

Mr. Raymond Ellison, President
Telephone: (713) 7983
11011 Richmond Ave., Suite 500
Houston, TX 77042

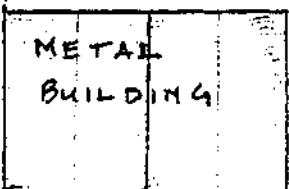
In a telephone conversation with this investigator on March 21, 1990, Mr. Ellison stated that Hercules Offshore Drilling Co. moved its operations in January, 1989 from the leased property on Lettie Street, Harris county, to a site in Freeport, Brazoria county.

Because Hercules Offshore Drilling co. has created a nuisance and endangered waters of the state, the public health and welfare by irresponsible handling of the industrial solid waste, it is responsible for the cleanup of the above referenced site.

- Turned over 55-gallon drums
- upright 55-gallon drums.
- Direction of photographs



TELEPHONE ROAD



Tires

12
11
10
9
8
7
6
5
4
3
2
1



Abandoned Truck.

LETTIE STREET



TEXAS WATER COMMISSION Attachment 3
District No. 07

HERCULES OFFSHORE DRILLING CO
TWC REG. 30141
Inspection dates: Oct. 20, 1969 & March 21, 1990
ATA or Release Attachment 3

COMPANY DISTRICT
COMPANY NAME

*** TEXAS WATER COMMISSION ***
INDUSTRIAL SOLID WASTE SYSTEM
REGISTRATION
FULL RECORD REPORT

PAGE 18040
DATE 01/03/90

18041
01/03/90

HERCULES OFFSHORE

GENERAL INFORMATION:

HERCULES OFFSHORE
DRILLING COMPANY
1381 MEADOWGLEN LANE
DUSTON, TEXAS 77082

RECORD TYPE: GENERATOR
REPORT FREQUENCY: A 07-87
REGISTRATION DATE: 05-10-77
LAST CHANGE DATE: 03-03-89
EMPLOYEE GROUP: LESS THAN 100
STATUS: ACTIVE
EPA ID NUMBER: TXD980626121
STAFF: NFD
HAZ WASTE STATUS: GENERATOR
METHOD TRANSPORT:

CONTACT: Raymond Ellison, President
J.B. NICHOLSON
PHONE: 713-621-8500 (713) 789-7983
BASIN: 11 SAN JACINTO-BRAZOS COASTAL
SEGMENT: 1111
DISTRICT: 07
REGION:
COUNTY: 020 BRAZORIA
WFO:

GENERATING SITE LOCATION: BRAZORIA CO. RD. 756, 1 MI EAST OF HWY 332 ✓

WASTE GENERATION SUMMARY:

EQ	WCC	WASTE DESCRIPTION AND DISPOSITION	CLASS	FORM
01	109270	WASHINGS FROM BARGES, TANKS, OR TANK CARS, ETC.-MISC. CHEMS ON-SITE/OFF-SITE/SOLD FOR RECOVERY	I	LIQUID (WATER BASE)
02	110760	CHEMICALS, ORGANIC (DRAINAGE, FLUSHINGS AND WASHINGS) ON-SITE/OFF-SITE/SOLD FOR RECOVERY	I	LIQUID (NON-WATER BASE)
03	979490	SLUDGE, EVAPORATION POND (ORGANICS & HYDROCARBONS) EPA NOS: NO LONGER GENERATED	TH	SOLID (PREDOMINANTLY INORGANIC)
04	250150	PETROLEUM REFINING STILL BOTTOMS ON-SITE/OFF-SITE/SOLD FOR RECOVERY	TH	SLUDGE (NON-WATER BASE)

MANAGEMENT FACILITIES SUMMARY:
DESCRIPTION AND STATUS

CE IMPOUNDMENT

DISTRICT: 07

COUNTY: 020 BRAZORIA
BASIN: 11 SAN JACINTO-BRAZOS COASTAL
SEGMENT: 1111

LATITUDE:
LONGITUDE:
SURFACE AREA:
DATE OPENED:
DATE INACTIVE: 04-83
DATE CLOSED: 08-82
SUBJECT TO PERMIT: YES
DEED REQUIRED: YES
CAPACITY: 3.5 MGAL
ELEVATION:
DATE RECORDED:

FACILITY USE: DISPOSAL

001 WASHINGS FROM BARGES, TANKS, OR TANK CARS, ETC.-MISC. CHEMS

FACILITY DESCRIPTION: LINED PONDS

BULK STORAGE: AREA
ACTIVE

LATITUDE:
LONGITUDE:
SURFACE AREA:
DATE OPENED: 04-83
DATE INACTIVE:
DATE CLOSED:
SUBJECT TO PERMIT: YES
DEED REQUIRED:
CAPACITY:
ELEVATION:
DATE RECORDED:

FACILITY USE: STORAGE

DW0505

SEQUENCE: COMPANY DISTRICT
COMPANY NAME*** TEXAS WATER COMMISSION ***
INDUSTRIAL SOLID WASTE SYSTEM
REGISTRATION
FULL RECORD REPORTPAGE 18041
DATE 01/03/90

30181 HERCULES OFFSHORE (CONT)

SOLID WASTE MANAGEMENT FACILITIES SUMMARY (CONT):

001 I WASHINGS FROM BARGES, TANKS, RR TANK CARS, ETC.-MISC. CHEMS
 002 I CHEMICALS, ORGANIC (DRAINAGE, FLUSHINGS AND WASHINGS)
 004 II PETROLEUM REFINING STILL BOTTOMS
 FACILITY DESCRIPTION: MOVEABLE BARGE

03 TANK
ACTIVE

LATITUDE:
 LONGITUDE:
 SURFACE AREA:
 DATE OPENED: 04-83
 DATE INACTIVE:
 DATE CLOSED:
 SUBJECT TO PERMIT: YES
 DEED REQUIRED: DATE RECORDED:

FACILITY USE: STORAGE

001 I WASHINGS FROM BARGES, TANKS, RR TANK CARS, ETC.-MISC. CHEMS
 002 I CHEMICALS, ORGANIC (DRAINAGE, FLUSHINGS AND WASHINGS)
 004 II PETROLEUM REFINING STILL BOTTOMS
 FACILITY DESCRIPTION:

04 TANK
ACTIVE

LATITUDE:
 LONGITUDE:
 SURFACE AREA:
 DATE OPENED: 04-83
 DATE INACTIVE:
 DATE CLOSED:
 SUBJECT TO PERMIT: YES
 DEED REQUIRED: DATE RECORDED:

FACILITY USE: STORAGE

001 I WASHINGS FROM BARGES, TANKS, RR TANK CARS, ETC.-MISC. CHEMS
 002 I CHEMICALS, ORGANIC (DRAINAGE, FLUSHINGS AND WASHINGS)
 004 II PETROLEUM REFINING STILL BOTTOMS
 FACILITY DESCRIPTION:

05 SURFACE IMPOUNDMENT
CLOSED

LATITUDE:
 LONGITUDE:
 SURFACE AREA:
 DATE OPENED:
 DATE INACTIVE:
 DATE CLOSED: 08-82
 SUBJECT TO PERMIT: YES
 DEED REQUIRED: DATE RECORDED:

FACILITY USE: STORAGE

003 IH SLUDGE, EVAPORATION POND (ORGANICS & HYDROCARBONS)
 FACILITY DESCRIPTION: LINED PONDS

T&E 000424

HERCULES OFFSHORE DRILLING CO.
TWC Reg. No. 30141
Photograph by Ata ur Rahman on October 20, 1989
Refer to attachment 3 for photograph locations

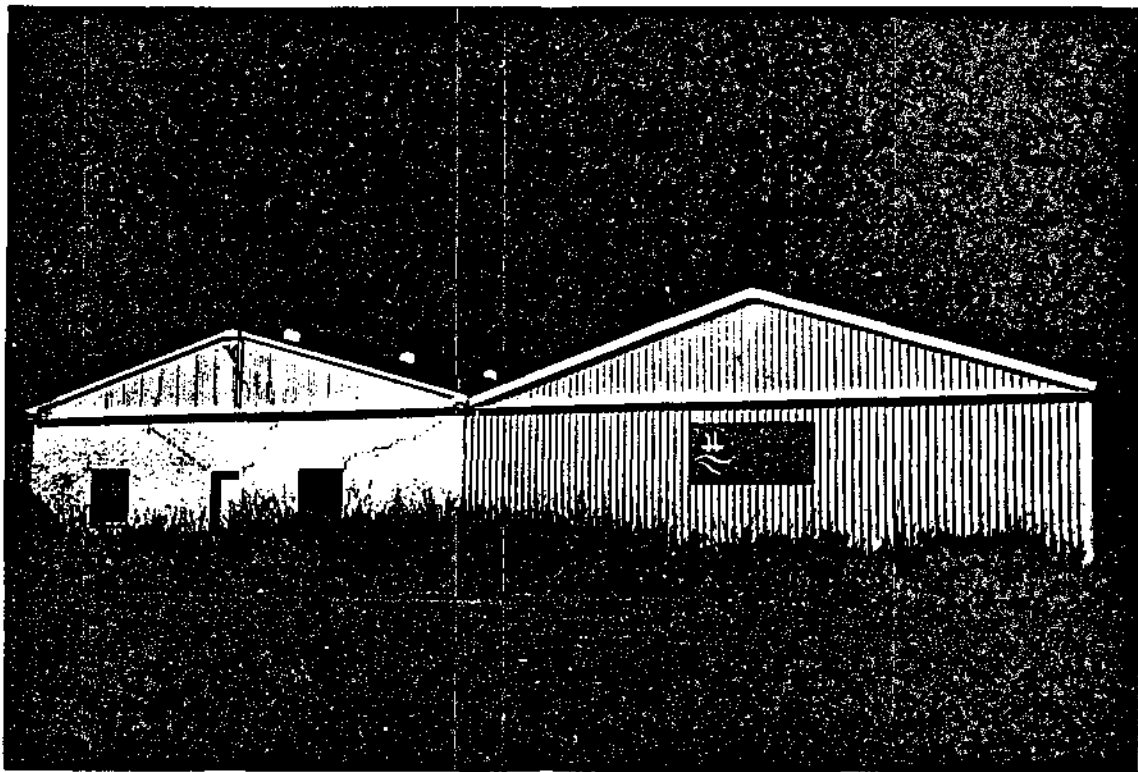


Photo No. 1. Abandoned buildings with clearly visible facility sign.



Photo No. 2. Facility's sign on the abandoned building.

ERCULES OFFSHORE DRILLING).

TWC Reg. No. 30141

Photograph by Ata ur Rahman on October 20, 1989

Refer to attachment 3 for photograph locations



Photo No. 3. Dark stained contaminated soil and abandoned drums. Facility's building is near the right margin.



Photo No. 4. Dark stained soil and general refuse littered on the site.

HERCULES OFFSHORE DRILLING CO.

TWC Reg. No. 30141

Photograph by Ata ur Rahman on October 20, 1989

Refer to attachment 3 for photograph locations



Photo No. 5. Leaking abandoned drums resulting in soil contamination.



Photo No. 6. Leaking abandoned drum with engine oil label.

T&E 000427

HERCULES OFFSHORE DRILLING CO.
TWC Registration No. 30141
Photograph by Ata ur Rahman on October 20, 1989
Refer to attachment 3 for photograph locations

T&E 000428

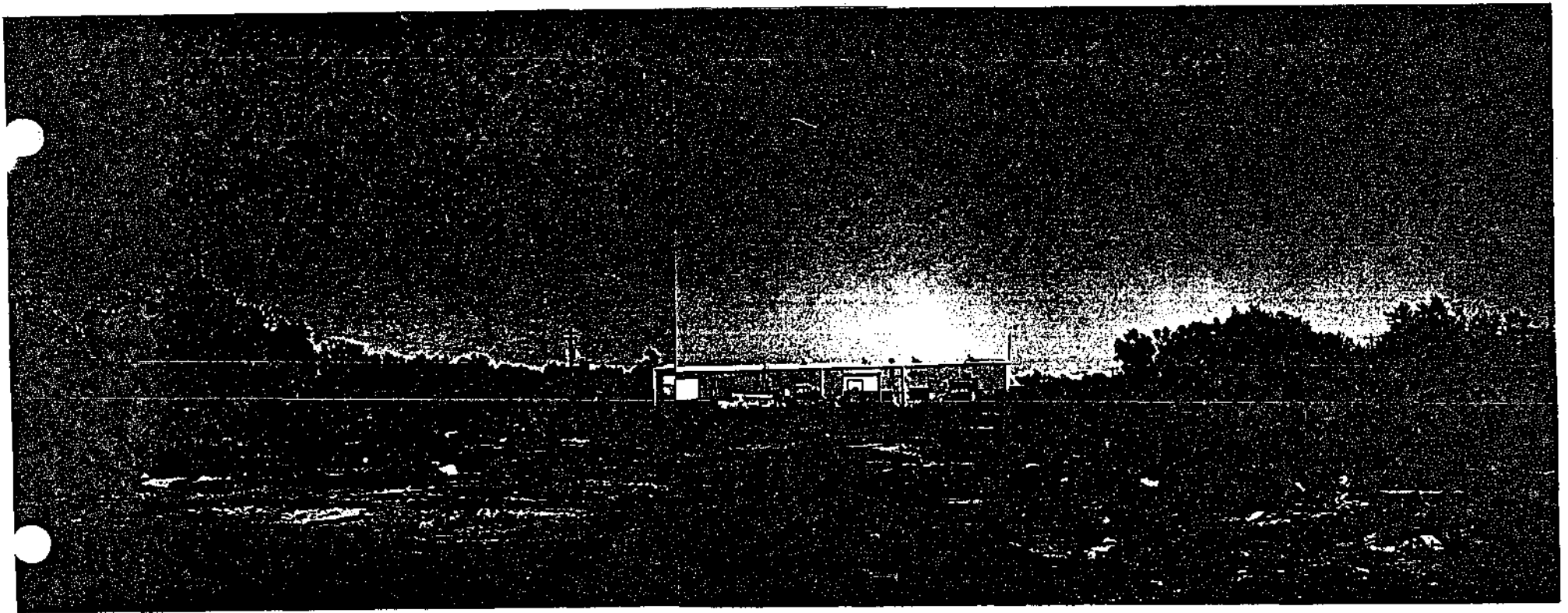


Photo Nos. 7 and 8. General view of the site showing contaminated soil, littered drums, and general refuse.

MERCULES OFFSHORE DRILLING CO.

TWC Reg. No. 30141

Photograph by Ata ur Rahman on October 20, 1989
Refer to attachment 3 for photograph locations



Photo No. 9. General view showing abandoned drums and contaminated soil.

T&E 000429

HERCULES OFFSHORE DRILLING CO.
TWC Registration No. 30141
Photograph by Ata ur Rahman on October 20, 1989
Refer to attachment 3 for photograph locations



Photo Nos. 10 and 11. General view showing contaminated soil, abandoned drums, tires and general refuse.

HERCULES OFFSHORE DRILLING CO.

TWC Reg. No. 30141

Photograph by Ata ur Rahman on October 20, 1989

Refer to attachment 3 for photograph locations



Photo No. 12. Discarded tires left behind on the abandoned site.

TEXAS WATER COMMISSION
Investigation Report
District 7

Date Investigation Requested: 10/9/89

Source: Telephone
Investigation No. EF9004407

Name: Anonymous
Address: _____
City, State, Zip: _____
Telephone: _____

Type
Pollution, Surface Water _____
Pollution, Ground Water _____
Solid Waste _____ X
Water Rights _____
Others _____

Location: Hercules Offshore Drilling Co., abandoned site on Lettie Street, off Telephone Road (see attachment 1).

Key Map Location: 575 W

Alleged Problem: The abandoned site is littered with partially empty drums and buckets containing oil and unknown chemicals.

Summary of Investigation: Ata ur Rahman inspected the site on October 10, 1989 and March 21, 1990. The site of Hercules Offshore Drilling Co is littered with drums partially filled with oil and chemicals, used tires, discarded (see attached page for continuation).

X Interim Status of Corrective Action if problem is not yet resolved
Final Resolution of Problem: The facility is advised through the attached Notice of Violation dated April 9, 1990 to:

1. clean up the abandoned site on Lettie Street in compliance with 31 TAC 335.4 and Texas Water Code 26.266(a).
2. Update its Notice of Registration to reflect correct contact person telephone number and mailing address.

Date and method of notification of person making request for assistance or complaint: N/A

County Harris Segment No. 1007

Stennie Meadows
Signature of Investigator
for Ata ur Rahman
Stennie A. Meadows
Stennie A. Meadows

River Basin San Jacinto TWC Reg No. 30141

Date: 3/22/90

SAM/AUR/tl

cc: John Ward

T&E 000432

Summary of Investigation (cont.):

equipment and other refuse. The soil within the facility is stained and appears to be contaminated with oil and other unknown chemicals (photographs 1-12. See attachment 3 for site map). Under 31 TAC 335.4 - General Prohibitions, the leaking drums and contaminated soil has created a nuisance and endangered the public health and welfare. Additionally, the runoff and seepage from this facility has caused an imminent threat of discharge and industrial solid waste to the waters of the State. The facility has failed to remove the contaminated soil, resulting from the spills (Texas Water Code 26.266). Record review of the facility indicated that the Notice of Registration (NOR) lists incorrect telephone number, mailing address and the contact person (see NOR).

The current contact information for Hercules Offshore Drilling Co. is noted below:

Mr. Raymond Ellison, President
Telephone: (713) 7983
11011 Richmond Ave., Suite 500
Houston, TX 77042

In a telephone conversation with this investigator on March 21, 1990, Mr. Ellison stated that Hercules Offshore Drilling Co. moved its operations in January, 1989 from the leased property on Lettie Street, Harris county, to a site in Freeport, Brazoria county.

Because Hercules Offshore Drilling co. has created a nuisance and endangered waters of the state, the public health and welfare by irresponsible handling of the industrial solid waste, it is responsible for the cleanup of the above referenced site.

TEXAS WATER COMMISSION
Investigation Report
District 7

Harston
PLANT

Date Investigation Requested: 10/9/89

Source: Telephone
Investigation No. EF9004407

Name: Anonymous
Address: _____
City, State, Zip: _____
Telephone: _____

Type
Pollution, Surface Water _____
Pollution, Ground Water _____
Solid Waste X
Water Rights _____
Others _____

Location: Hercules Offshore Drilling Co., abandoned site on Lettie Street, off Telephone Road (see attachment 1).

Key Map Location: 575 W

Alleged Problem: The abandoned site is littered with partially empty drums and buckets containing oil and unknown chemicals.

Summary of Investigation: Ata ur Rahman inspected the site on October 10, 1989 and March 21, 1990. The site of Hercules Offshore Drilling Co. is littered with drums partially filled with oil and chemicals, used tires, discarded (see attached page for continuation).

X Interim Status of Corrective Action if problem is not yet resolved
Final Resolution of Problem: The facility is advised through the attached Notice of Violation dated April 9, 1990 to:

1. clean up the abandoned site on Lettie Street in compliance with 31 TAC 335.4 and Texas Water Code 26.266(a).
2. Update its Notice of Registration to reflect correct contact person, telephone number and mailing address.

Date and method of notification of person making request for assistance or complaint: N/A

County Harris Segment No. 1007

Stennie Meadows
Signature of Investigator
for *Ata ur Rahman*
Stennie A. Meadows
Stennie A. Meadows

River Basin San Jacinto TWC Reg No. 30141

Date: 3/22/90

SAM/AUR/tl

cc: John Ward

T&E 000171

Summary of Investigation (cont.):

equipment and other refuse. The soil within the facility is stained and appears to be contaminated with oil and other unknown chemicals (photographs 1-12. See attachment 3 for site map). Under 31 TAC 335.4 - General Prohibitions, the leaking drums and contaminated soil has created a nuisance and endangered the public health and welfare. Additionally, the runoff and seepage from this facility has caused an imminent threat of discharge and industrial solid waste to the waters of the State. The facility has failed to remove the contaminated soil, resulting from the spills (Texas Water Code 26.266). Record review of the facility indicated that the Notice of Registration (NOR) lists incorrect telephone number, mailing address and the contact person (see NOR).

The current contact information for Hercules Offshore Drilling Co. is noted below:

Mr. Raymond Ellison, President
Telephone: (713) 7983
11011 Richmond Ave., Suite 500
Houston, TX 77042

In a telephone conversation with this investigator on March 21, 1990, Mr. Ellison stated that Hercules Offshore Drilling Co. moved its operations in January, 1989 from the leased property on Lettie Street, Harris county, to a site in Freeport, Brazoria county.

Because Hercules Offshore Drilling co. has created a nuisance and endangered waters of the state, the public health and welfare by irresponsible handling of the industrial solid waste, it is responsible for the cleanup of the above referenced site.

Grasso Oilfield Services, Inc.
1021 Tarpon Lane
P.O. Box 3344 A
Freeport, Texas 77541
409/233-0176
Houston: 713/393-1520



3-24-90

To whom it may concern:

Grasso oilfield services recieved from
Hercules Offshore 5 drums of waste oil which we disposed of
in our bulk waste oil tank. This oil will be picked up by a
waste oil co. at a later date.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey H. [unclear]', is written over the typed name.

Terminal manager Freeport

T&E 000268

Grasso Oilfield Services, Inc.
1021 Tarpon Lane
P.O. Box 3344 A
Freeport, Texas 77541
409/233-0176
Houston: 713/393-1520



3-24-90

To whom it may concern:

Grasso oilfield services recieved from
Hercules Offshore 5 drums of waste oil which we disposed of
in our bulk waste oil tank. This oil will be picked up by a
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Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey H. [unclear]", is written over the typed name.

Terminal manager Freeport

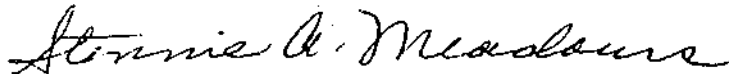
T&E 000264

Mr. Raymond Ellison
Hercules Offshore Drilling Co.
April 9, 1990
Page 3

A copy of the Texas Administrative Code (TAC) Title 31 regulations can be obtained for a fee from West Publishing Company P.O. Box 64526 St. Paul, MN 55164, Phone: 1-800-328-9352. The Code of Federal Regulations (40 CFR), are available from the U. S. Government Printing Office, Washington, D. C. 20402.

If you have any questions regarding these matters, please contact Ata ur Rahman of the TWC District 07 office at (713) 479-5981.

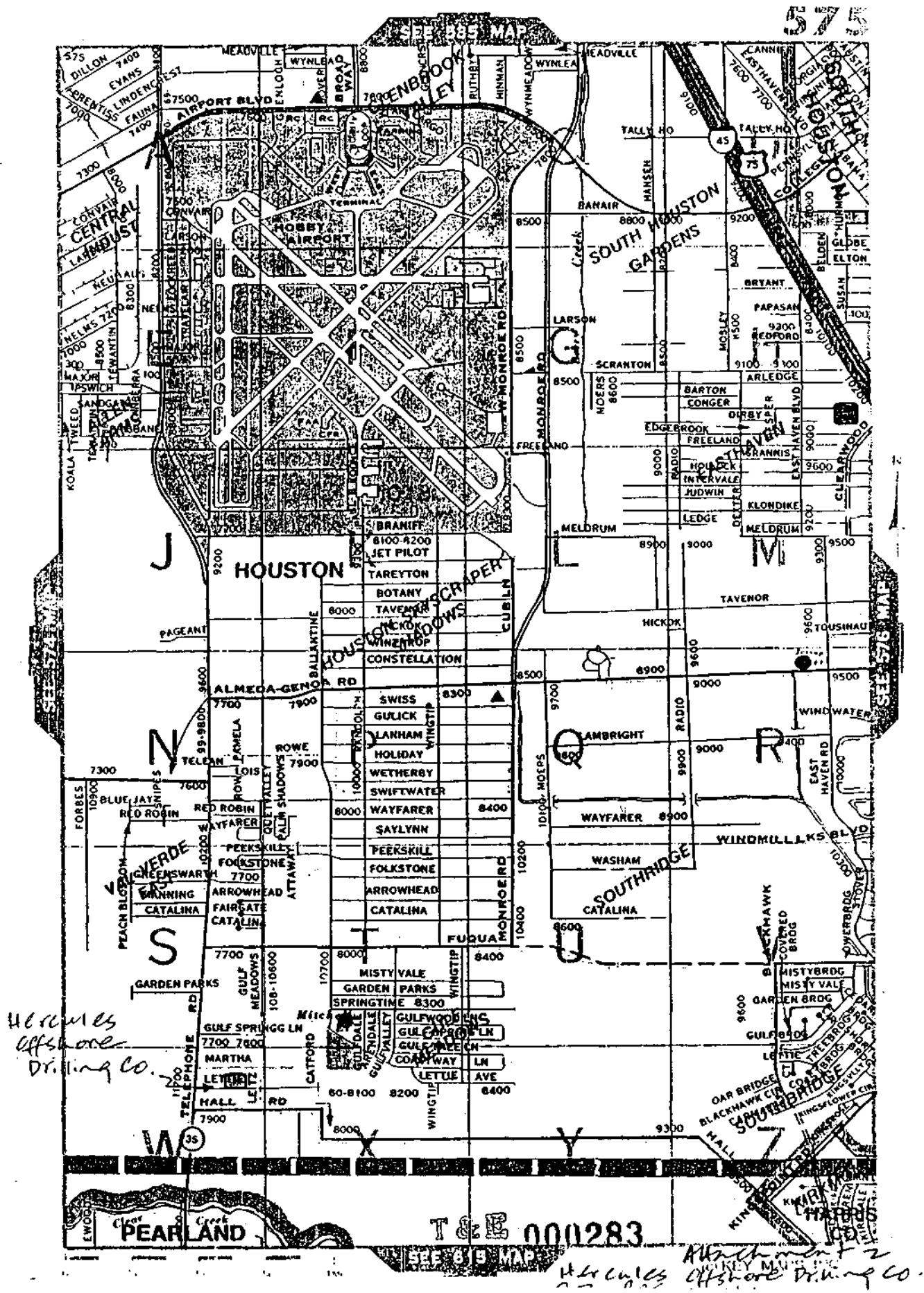
Sincerely,



Stennie A. Meadours
Emergency Response Coordinator
Hazardous and Solid Waste Program
Southeast Region

SAM/AUR/tl

T&E 000282





- Turned over 55-gallon drums
- upright 55-gallon drums
- Direction of photographs

TELEPHONE ROAD

Tires

12
11
10
8
5

9
8
7
4

Abandoned Truck.

METAL BUILDING

LETTIE STREET

2

1

TEXAS WATER COMMISSION
District No. 07
Attachment 3

HERCULES OFFSHORE DRILLING CO

TWC REG. 30141

Inspection dates: Oct. 20, 1989 & March 21, 1990

Atx in Release - Attachment 3

T&E 00000000

*** TEXAS WATER COMMISSION ***
 INDUSTRIAL SOLID WASTE SYSTEM
 REGISTRATION
 FULL RECORD REPORT

PAGE 18040
 DATE 01/03/90

18041
 01/03/90

COMPANY DISTRICT
 COMPANY NAME

HERCULES OFFSHORE

AL INFORMATION:
 HERCULES OFFSHORE
 DRILLING COMPANY
 381 MEADOWGLEN LANE
 USTON, TEXAS 77082

RECORD TYPE: GENERATOR
 REPORT FREQUENCY: A 07-87
 REGISTRATION DATE: 05-10-77
 LAST CHANGE DATE: 03-03-89
 EMPLOYEE GROUP: LESS THAN 100
 STATUS: ACTIVE
 EPA ID NUMBER: TXD980626121
 STAFF: WFO
 HAZ WASTE STATUS: GENERATOR
 METHOD TRANSPORT:

CONTACT: J.B. NICHOLSON
 PHONE: 713-621-8300 (713) 789-7983
 BASIN: 11 SAN JACINTO-BRAZOS COASTAL
 SEGMENT: 1111
 DISTRICT: 07
 REGION:
 COUNTY: 020 BRAZORIA
 UIC:

GENERATING SITE LOCATION: BRAZORIA CO. RD. 756.1 MI EAST OF HWY 332 ✓

WASTE GENERATION SUMMARY:

WCC	WASTE DESCRIPTION AND DISPOSITION	CLASS	FORM
109270	WASHINGS FROM BARGES, TANKS, OR TANK CARS, ETC.-MISC. CHEMS ON-SITE/OFF-SITE/SOLD FOR RECOVERY	I	LIQUID (WATER BASE)
110760	CHEMICALS, ORGANIC (DRAINAGE, FLUSHINGS AND WASHINGS) ON-SITE/OFF-SITE/SOLD FOR RECOVERY	I	LIQUID (NON-WATER BASE)
979490	SLUDGE, EVAPORATION POND (ORGANICS & HYDROCARBONS) EPA NOS: NO LONGER GENERATED	II	SOLID (PREDOMINANTLY INORGANIC)
250150	PETROLEUM REFINING STILL BOTTOMS ON-SITE/OFF-SITE/SOLD FOR RECOVERY	II	SLUDGE (NON-WATER BASE)

MANAGEMENT FACILITIES SUMMARY:
 DESCRIPTION AND STATUS

CE IMPOUNDMENT

DISTRICT: 07
 COUNTY: 020 BRAZORIA
 BASIN: 11 SAN JACINTO-BRAZOS COASTAL
 SEGMENT: 1111

LATITUDE:
 LONGITUDE:
 SURFACE AREA:
 DATE OPENED:
 DATE INACTIVE: 04-83
 DATE CLOSED: 08-82
 SUBJECT TO PERMIT: YES
 DEED REQUIRED: YES
 CAPACITY: 5.5 MGAL
 ELEVATION:
 DATE RECORDED:

FACILITY USE: DISPOSAL

001 1 WASHINGS FROM BARGES, TANKS, OR TANK CARS, ETC.-MISC. CHEMS
 FACILITY DESCRIPTION: LINED PONDS

BULK STORAGE AREA
 ACTIVE

LATITUDE:
 LONGITUDE:
 SURFACE AREA:
 DATE OPENED: 04-83
 DATE INACTIVE:
 DATE CLOSED:
 SUBJECT TO PERMIT: YES
 DEED REQUIRED:
 CAPACITY:
 ELEVATION:
 DATE RECORDED:

FACILITY USE: STORAGE

0001095

DW0505

SEQUENCE: COMPANY DISTRICT
COMPANY NAME*** TEXAS WATER COMMISSION ***
INDUSTRIAL SOLID WASTE SYSTEM
REGISTRATION
FULL RECORD REPORTPAGE 18041
DATE 01/03/9030121 HERCULES OFFSHORE (CONT)
SOLID WASTE MANAGEMENT FACILITIES SUMMARY (CONT):001 I WASHINGS FROM BARGES, TANKS, RR TANK CARS, ETC.-MISC. CHEMS
002 I CHEMICALS, ORGANIC (DRAINAGE, FLUSHINGS AND WASHINGS)
004 II PETROLEUM REFINING STILL BOTTOMS
FACILITY DESCRIPTION: MOVEABLE BARGE03 TANK
ACTIVELATITUDE:
LONGITUDE:
SURFACE AREA:
DATE OPENED: 04-83
DATE INACTIVE:
DATE CLOSED:
SUBJECT TO PERMIT: YES
DEED REQUIRED: DATE RECORDED:

FACILITY USE: STORAGE

001 I WASHINGS FROM BARGES, TANKS, RR TANK CARS, ETC.-MISC. CHEMS
002 I CHEMICALS, ORGANIC (DRAINAGE, FLUSHINGS AND WASHINGS)
004 II PETROLEUM REFINING STILL BOTTOMS
FACILITY DESCRIPTION:04 TANK
ACTIVELATITUDE:
LONGITUDE:
SURFACE AREA:
DATE OPENED: 04-83
DATE INACTIVE:
DATE CLOSED:
SUBJECT TO PERMIT: YES
DEED REQUIRED: DATE RECORDED:

FACILITY USE: STORAGE

001 I WASHINGS FROM BARGES, TANKS, RR TANK CARS, ETC.-MISC. CHEMS
002 I CHEMICALS, ORGANIC (DRAINAGE, FLUSHINGS AND WASHINGS)
004 II PETROLEUM REFINING STILL BOTTOMS
FACILITY DESCRIPTION:05 SURFACE IMPOUNDMENT
CLOSEDLATITUDE:
LONGITUDE:
SURFACE AREA:
DATE OPENED:
DATE INACTIVE:
DATE CLOSED: 08-82
SUBJECT TO PERMIT: YES
DEED REQUIRED: DATE RECORDED:

FACILITY USE: STORAGE

003 IM SLUDGE EVAPORATION POND (ORGANICS & HYDROCARBONS)
FACILITY DESCRIPTION: LINED PONDS082000
T&E

RCULES OFFSHORE DRILLING

TWC Reg. No. 30141

Photograph by Ata ur Rahman on October 20, 1989

Refer to attachment 3 for photograph locations



Photo No. 1. Abandoned buildings with cleary visible facility sign.



Photo No. 2. Facility's sign on the abandoned building.

T&E 000287

HERCULES OFFSHORE DRILLING

TWC Reg. No. 30141

Photograph by Ata ur Rahman on October 20, 1989

Refer to attachment 3 for photograph locations



Photo No. 3. Dark stained contaminated soil and abandoned drums. Facility's building is near the right margin.



Photo No. 4. Dark stained soil and general refuse littered on the site.

HERCULES OFFSHORE DRILLING C
TWC Reg. No. 30141
Photograph by Ata ur Rahman on October 20, 1989
Refer to attachment 3 for photograph locations



Photo No. 5. Leaking abandoned drums resulting in soil contamination.



Photo No. 6. Leaking abandoned drum with engine oil label.

T&E 000289

HERCULES OFFSHORE DRILLING CO.
TWC Registration No. 30141
Photograph by Ata ur Rahman on October 20, 1989
Refer to attachment 3 for photograph locations



Photo Nos. 7 and 8. General view of the site showing contaminated soil, littered drums, and general refuse.

000290

HULES OFFSHORE DRILLING CO

TWC Reg. No. 30141

Photograph by Ata ur Rahman on October 20, 1989

Refer to attachment 3 for photograph locations



Photo No. 9. General view showing abandoned drums and contaminated soil.

HERCULES OFFSHORE DRILLING CO.
TWC Registration No. 30141
Photograph by Ata ur Rahman on October 20, 1989
Refer to attachment 3 for photograph locations

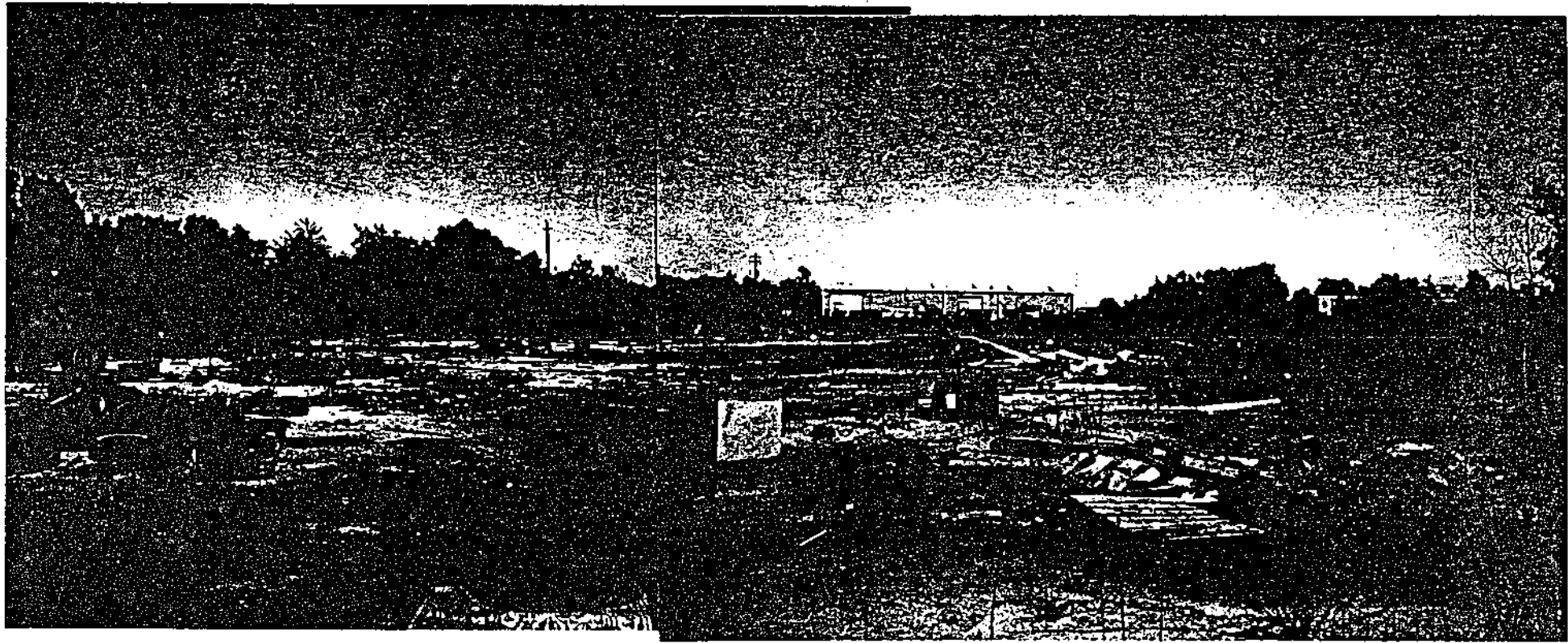


Photo Nos. 10 and 11. General view showing contaminated soil, abandoned drums, tires and general refuse.

T&E 000292

H. CULES OFFSHORE DRILLING CO.

TWC Reg. No. 30141

Photograph by Ata ur Rahman on October 20, 1989
Refer to attachment 3 for photograph locations



Photo No. 12. Discarded tires left behind on the abandoned site.



Strength through experience, equipment, know-how

11011 Richmond Ave., Suite 500
Houston, Texas 77042

Office (713) 789-7983
Fax (713) 789-4063

April 24, 1990

Texas Water Commission
Registration and Classification Unit
P. O. Box 13087 Capital Station
Austin, TX 78711-3087

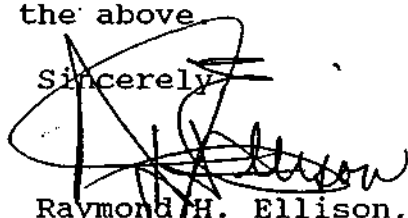
Gentlemen:

Hercules Offshore Corporation (registration number 30141) informs you of the following:

- 1) Name change from Hercules Offshore Drilling Company to Hercules Offshore Corporation.
- 2) Our new mailing address is 11011 Richmond Avenue, Suite 500, Houston, Texas 77042.
- 3) Contact Person: R. H. Ellison, Jr.
Phone #: (713) 789-7983

Please change your records to reflect the above

Sincerely,


Raymond H. Ellison, Jr.
President

RHE/ljj

cc/ Mr. Ata Rahman
Deer Park Office
4301 Center Street
Deer Park, TX 77536-6299

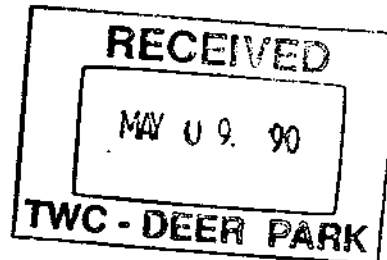
T&E 000267



Strength through experience, equipment, know-how

11011 Richmond Ave., Suite 500
Houston, Texas 77042

Office (713) 789-7983
Fax (713) 789-4063



April 24, 1990

Texas Water Commission
Registration and Classification Unit
P. O. Box 13087 Capital Station
Austin, TX 78711-3087

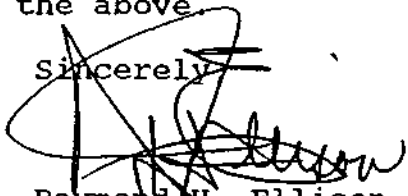
Gentlemen:

Hercules Offshore Corporation (registration number 30141) informs you of the following:

- 1) Name change from Hercules Offshore Drilling Company to Hercules Offshore Corporation.
- 2) Our new mailing address is 11011 Richmond Avenue, Suite 500, Houston, Texas 77042.
- 3) Contact Person: R. H. Ellison, Jr.
Phone #: (713) 789-7983

Please change your records to reflect the above

Sincerely,


Raymond H. Ellison, Jr.
President

RHE/ljj

cc/ Mr. Ata Rahman
Deer Park Office
4301 Center Street
Deer Park, TX 77536-6299

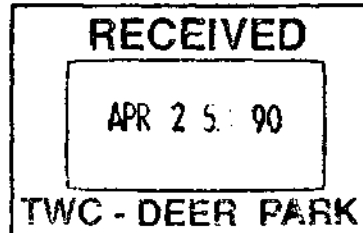
T&E 000263



Strength through experience, equipment, know-how

11011 Richmond Ave., Suite 500
Houston, Texas 77042

Office (713) 789-7983
Fax (713) 789-4063



April 24, 1990

Texas Water Commission
Registration and Classification Unit
P. O. Box 13087 Capital Station
Austin, TX 78711-3087

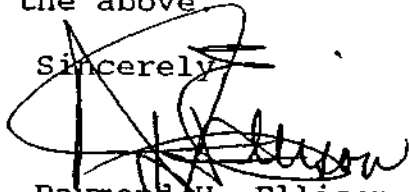
Gentlemen:

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Phone #: (713) 789-7983

Please change your records to reflect the above

Sincerely,



Raymond H. Ellison, Jr.
President

RHE/ljj

cc/ Mr. Ata Rahman
Deer Park Office
4301 Center Street
Deer Park, TX 77536-6299

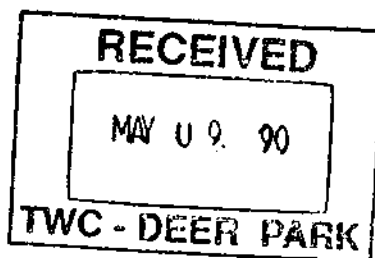
T&E 000269



Strength through experience, equipment, know-how

11011 Richmond Ave., Suite 500
Houston, Texas 77042

Office (713) 789-7983
Fax (713) 789-4063



May 8, 1990

Mr. Ata ur Rahman
Southeast Region
Texas Water Commission
4301 Center Street
Deer Park, Texas 77536-6299

RE: Hercules Offshore Corporation
Lettie Street Facility Clean Up
(Former Leased Facility Vacated 01/20/89)
Houston, TX
TWC Registration No. 30141

Gentlemen:

In response to your letter of April 9, 1990, we offer the following:

1. 31 - Texas Administrative Code - Notification Requirements

We have complied with the Notification Requirements by our letter of April 24, 1990, a copy of which is attached.

2. 31 - General Prohibitions

Hercules Offshore Corporation vacated the aforementioned leased property in late January, 1989, and left same in a reasonable state of order. Evidently, during the past 15 months, the property has been used as a dump site by persons unknown to us. While we don't believe that most of the material and debris that existed on the property (including the oil drums) when we were notified of the problem are ours, we have nevertheless set out to clean the property up.

3. Texas Water Code Section 26.266 - Removal of Spill or Discharge

On March 24, 1990, we removed oil drums from the site and properly disposed of them and their contents. On April 23, 1990, we initiated an extensive clean up program of the surface of the site. All junk and trash has now been removed.

T&E 000265

Texas Water Commission
May 8, 1990
Page two

A sampling and testing program was also initiated with the goal of characterizing the surface contamination for disposal or treatment, the decision of which will be forthcoming the week of May 13, 1990. Having ascertained the nature of the surface contamination, we will proceed immediately with removal and/or clean up. After the surface clean up is performed, we will conduct 6 to 8 boring tests for subsurface contamination.

Please be assured that we are concerned about the annoyance and possible health endangerment to the public and we have and will proceed as fast as possible to abate the condition. Upon final clean up of this situation to the satisfaction of the Texas Water Commission, we would like to be furnished a certificate stating that we have brought the property into compliance and we have no further liability concerning this matter.

If all of the above meets with the Commission's approval, we would like to keep the Commission updated on a monthly basis as to our progress. Our next reporting date would be June 10, 1990.

Sincerely,



Raymond H. Ellison, Jr.
President

RHE/ljj

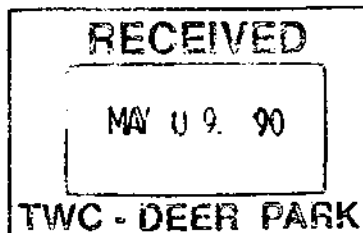
cc/ Stennie A. Meadours
Emergency Response Coordinator
Texas Water Commission



Strength through experience, equipment, know-how

11011 Richmond Ave., Suite 500
Houston, Texas 77042

Office (713) 789-7983
Fax (713) 789-4063



May 8, 1990

Mr. Ata ur Rahman
Southeast Region
Texas Water Commission
4301 Center Street
Deer Park, Texas 77536-6299

RE: Hercules Offshore Corporation
Lettie Street Facility Clean Up
(Former Leased Facility Vacated 01/20/89)
Houston, TX
TWC Registration No. 30141

Gentlemen:

In response to your letter of April 9, 1990, we offer the following:

1. 31 - Texas Administrative Code - Notification Requirements

We have complied with the Notification Requirements by our letter of April 24, 1990, a copy of which is attached.

2. 31 - General Prohibitions

Hercules Offshore Corporation vacated the aforementioned leased property in late January, 1989, and left same in a reasonable state of order. Evidently, during the past 15 months, the property has been used as a dump site by persons unknown to us. While we don't believe that most of the material and debris that existed on the property (including the oil drums) when we were notified of the problem are ours, we have nevertheless set out to clean the property up.

3. Texas Water Code Section 26.266 - Removal of Spill or Discharge

On March 24, 1990, we removed oil drums from the site and properly disposed of them and their contents. On April 23, 1990, we initiated an extensive clean up program of the surface of the site. All junk and trash has now been removed.

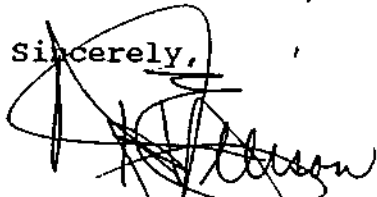
Texas Water Commission
May 8, 1990
Page two

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If all of the above meets with the Commission's approval, we would like to keep the Commission updated on a monthly basis as to our progress. Our next reporting date would be June 10, 1990.

Sincerely,



Raymond H. Ellison, Jr.
President

RHE/ljj

cc/ Stennie A. Meadours
Emergency Response Coordinator
Texas Water Commission

T&E 000262

Superfund Site Strategy Recommendation

Region 6

Site Name: Hercules Offshore Corporation Site Number: 6-1111

Alias Site Name(s):

Address: 906 Marlin AvenueCity/County or Parish/State/Zip: Freeport/Brazoria/TX/77541

Recommendation:

- ☒ 1. No further remedial action planned under Superfund.
- ☐ 2. Further pre-remedial investigative action needed under Superfund:

PA _____ Priority: High _____

- ☐ 3. Action may be appropriate under other authority:
- NPDES _____ SPCC _____ 404 _____ TSCA _____
- UIC _____ SMCRA _____ STATE _____ RCRA _____
- OTHER _____

Discussion: SSI EPI

This site was originally investigated as Fish Engineering and Construction (TXD980626121), however, after the PA it was decided to conduct a separate SSI for the two sites. Fish Engineering sold most of their operation to Hercules except for a lot which contained three surface impoundments and had a ground water contamination problem. This lot is being investigated separately as the Fish Engineering Site. The Hercules facility is used to clean and repair barges. Most of the repaired barges belong to Dow Chemical and they carry organics such as chloroform, trichloroethylene and cumene. The barges are drained of approximately 300 gallon of product heels which are stored in tanks and sold as product. Twelve storage tanks are on site. Empty barges are washed with detergent and City water or water from two site wells. The wash water is pumped into a storage tank, and depending on ppm of COD is either disposed of in a deep injection well, or transported to Impact, Inc. in Deer Park for disposal. No dikes or containment walls were observed at the banks of the Intracoastal Waterway or at the yard Intracoastal Waterway slip. There are no drinking water wells which might be affected by the site, and no surface water targets. There have been complaints of particulates from sand blasting of barges, as sand has blown to neighboring facilities. As this is an active site, and there appears to be little environmental problems with the site, no further remedial action is recommended.

Copies to (please list) TWC, 6E-E, 6W-S, ATSDR, 6H-PC, *but*Recommended By: WHA Date: 6/20/98Approved By: Betty Williamson Date: 6/20/98 000005

T&E

DW0550

TEXAS WATER COMMISSION
NOTICE OF REGISTRATION
SOLID WASTE MANAGEMENT

07-13-90

THIS IS NOT A PERMIT AND DOES NOT CONSTITUTE AUTHORIZATION OF ANY WASTE MANAGEMENT ACTIVITIES OR FACILITIES LISTED BELOW. REQUIREMENTS FOR SOLID WASTE MANAGEMENT ARE PROVIDED BY TEXAS ADMINISTRATIVE CODE SECTION 335 OF THE RULES OF THE TEXAS WATER COMMISSION (TWC). CHANGES OR ADDITIONS TO WASTE MANAGEMENT METHODS REFERRED TO IN THIS NOTICE REQUIRE WRITTEN NOTIFICATION TO THE TWC.

DATE OF NOTICE: 06-22-90

REGISTRATION DATE: 05-10-77

REGISTRATION NUMBER: 30141

EPA I.D. NUMBER: TX0980626121

THE REGISTRATION NUMBER PROVIDES ACCESS TO STORED INFORMATION PERTAINING TO YOUR OPERATION. PLEASE REFER TO THAT NUMBER IN ANY CORRESPONDENCE.

COMPANY NAME: HERCULES OFFSHORE
MAILING ADDRESS: CORPORATION
11011 RICHMOND AVE., SUITE 500
HOUSTON TX 77042

GENERATING SITE LOCATION:
BRAZORIA CO. RD. 756, 1 MI EAST OF HWY 332
CONTACT PERSON: R.H. ELLISON, JR.
PHONE: (713) 789-7983
NUMBER OF EMPLOYEES: LESS THAN 100
TWC DISTRICT: 07

REGISTRATION STATUS: ACTIVE
REGISTRATION TYPE: GENERATOR
HAZARDOUS WASTE STATUS:
GENERATOR

I. WASTE GENERATED:

WASTE NUMBER	DESCRIPTION	CLASS	CODE	DISPOSITION
001	WASHINGS FROM BARGES, TANKS, RR TANK CARS, ETC.-MISC. CHEMS	I	109270	ON-SITE/OFF-SITE/SOL D FOR RECOVERY
002	CHEMICALS, ORGANIC (DRAINAGE, FLUSHINGS AND WASHINGS)	I	110760	ON-SITE/OFF-SITE/SOL D FOR RECOVERY
003	SLUDGE, EVAPORATION POND (ORGA NICS & HYDROCARBONS)	IH	979490	NO LONGER GENERATED

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR
DESCRIPTIONS):

T&E 000251

004 PETROLEUM REFINING STILL 11 250150 ON-SITE/OFF-SITE/SOL
BOTTOMS D FOR RECOVERY

II. Shipping/Reporting: Pursuant to Section 335 of the Texas Administrative Code of the rules of the TWC pertaining to Hazardous Waste management, issuance of manifests and annual reporting are required for Off-site Storage/Processing/Disposal of the following wastes listed in Part I. All manifested wastes should be reported on the annual waste summary report and submitted to the TWC by the 25th of each January for the prior calendar year.

001 109270 WASHINGS FROM BARGES, TANKS,
RR TANK CARS, ETC.-MISC. CHEMS

002 110760 CHEMICALS, ORGANIC (DRAINAGE,
FLUSHINGS AND WASHINGS)

III. ON-SITE WASTE MANAGEMENT FACILITIES:

FAC NO.	FACILITY	STATUS
01	SURFACE IMPOUNDMENT DISPOSAL OF WASTE NUMBER(S) 001 5.5 MGAL. LINED PONDS	CLOSED
02	BULK STORAGE AREA STORAGE OF WASTE NUMBER(S) 001, 002, 004 MOVEABLE BARGE	ACTIVE
03	TANK STORAGE OF WASTE NUMBER(S) 001, 002, 004	ACTIVE
04	TANK STORAGE OF WASTE NUMBER(S) 001, 002, 004	ACTIVE
05	SURFACE IMPOUNDMENT STORAGE OF WASTE NUMBER(S) 003 5.5 MGAL LINED PONDS	CLOSED

UNLESS OTHERWISE STATED ABOVE, FACILITIES ARE LOCATED
AT BRAZORIA CO. RD. 756, 1 MI EAST OF HWY 332
COUNTY OF BRAZORIA

IV. RECORDS.

- A. FOR PURPOSES OF FILING ANNUAL REPORTS PURSUANT TO TEXAS ADMINISTRATIVE CODE SECTION 335 OF THE RULES OF THE TWC PERTAINING TO INDUSTRIAL SOLID WASTE MANAGEMENT, RECORDS SHOULD BE MAINTAINED FOR STORAGE, PROCESSING AND/OR DISPOSAL OF THE FOLLOWING WASTE(S) LISTED IN PART I:

001 109270 WASHINGS FROM BARGES, TANKS,
RR TANK CARS, ETC.-MISC. CHEMS

002 110760 CHEMICALS, ORGANIC (DRAINAGE,
FLUSHINGS AND WASHINGS)

- B. PROOF OF RECORDATION IN THE COUNTY DEED RECORDS, AS REQUIRED BY TEXAS ADMINISTRATIVE CODE SECTION 335 OF THE RULES OF THE TOWR, SHOULD BE SUBMITTED TO THE EXECUTIVE DIRECTOR FOR THE FOLLOWING FACILITIES LISTED IN PART III IN ACCORDANCE WITH THE FOLLOWING SCHEDULES:

NEW FACILITIES - PRIOR TO INITIATION OF
DISPOSAL OPERATIONS.

EXISTING FACILITIES - AS SOON AS POSSIBLE, BUT NO
LATER THAN SIXTY (60) DAYS FROM
THE DATE OF THIS NOTICE, UNLESS
PREVIOUSLY SUBMITTED.

FAC NO FACILITY

01 SURFACE IMPOUNDMENT



HERCULES

OFFSHORE CORPORATION

Strength through experience, equipment, know-how

11011 Richmond Ave., Suite 500
Houston, Texas 77042

Office (713) 789-7983
Fax (713) 789-4063

RECEIVED

SEP 06 1990

DISTRICT 7

September 5, 1990

CERTIFIED MAIL RECEIPT REQUEST

Texas Water Commission
Registration and Classification Unit
P. O. Box 13087 Capital Station
Austin, TX 78711-3087

Gentlemen:

This is to update you on Hercules Offshore Corporation (registration number 30141):

The contact person will be Robert H. Millis as R. H. Ellison, Jr. is no longer with the Company. Mr. Millis' phone number is (713) 789-7983.

Please change your records to reflect the above change.

Should you have any questions, please do not hesitate to contact Hercules Offshore Corporation at the above number.

Sincerely,

Robert H. Millis
Controller

RHM/ljj

T&E 000254



RECEIVED

SEP 13 1990

DISTRICT 7

*Strength through experience, equipment, know-how*11011 Richmond Ave., Suite 500
Houston, Texas 77042Office (713) 789-7983
Fax. (713) 789-4063

September 12, 1990

Mr. Ata ur Rahman
Southeast Region
Texas Water Commission
5144 East Sam Houston Parkway North
Houston, TX 77015

RE: HERCULES OFFSHORE CORPORATION
Lettie Street Facility Cleanup
(Former leased facility vacated 01/20/89)
Houston, Texas
TWC Registration No. 30141

Dear Mr. Rahman:

We have completed our clean up of the Lettie Street site. Approximately 92 tons of surface and excavated material was hauled to Carlyss, Louisiana. The manifests for this movement are attached.

The amount of material removed far exceeded our small contribution of random leaks and spills of hydraulic and motor oil, however we were dedicated and remain dedicated to act responsibly in this matter.

We are now requesting that the Commission approve this clean up and notify us of their approval. Our engineer, Mr. Ed Anderson, will be glad to meet with your representatives if you desire to discuss the details of the site work.

Very truly yours,,

A handwritten signature in dark ink, appearing to read "Robert H. Millis", is written over the typed name.

Robert H. Millis

RHM/ljj

Attachments

T&E 000255²

STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY
HAZARDOUS WASTE DIVISION
P.O. BOX 44307
BATON ROUGE, LOUISIANA 70804

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0038. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TX 014901207590101355		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Hercules Offshore Corporation 11011 Richmond Ave., Suite 500, Houston, TX 77042				A. State Manifest Document Number LA 1174577			
4. Generator's Phone (713) 789-7983				B. State Generator's ID XXX07			
5. Transporter 1 Company Name Bealine Service Company		6. US EPA ID Number TX 01980809859		C. State Transporter's ID 40421		D. Transporter's Phone 713/474-7772	
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter's ID		F. Transporter's Phone	
9. Designated Facility Name and Site Address Chemical Waste Management Route 2, John Brannon Road Carlyss, LA 70663		10. US EPA ID Number LA D000777201		G. State Facility's ID GDT-507-P		H. Facility's Phone 318/583-2169	
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number) *RQ, Hazardous Waste Solid, n.o.s., ORM-E, NA9189, (EPA-D004, D007, D008)				12. Containers No. Type 001 DIT 00015		13. Total Quantity 001	
				14. Unit WA/Vol		15. Waste No. D008, D004 D007 978030	
16. Additional Descriptions for Materials Listed Above CWM #K44208 WSI #JN0094 Direct all questions concerning shipment to WSI at 713/820-6778.				K. Handling Codes for Wastes Listed Above			
17. Special Handling Instructions and Additional Information Hazardous material, wear protective clothing when handling; gloves, goggles and tyvek suit. If spilled in Louisiana contact LADPS at 504/925-6595. In case of emergency contact generator and WSI at 713/820-6778.							
18. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this manifest are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I am aware of.							
Printed/Typed Name E.R. Anderson, Agent				Signature <i>E.R. Anderson</i>		Month Day Year 08/01/90	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name C. J. Bishop				Signature <i>C. J. Bishop</i>		Month Day Year 08/13/90	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name				Signature		Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 18. Printed/Typed Name							
Signature				Month Day Year			

STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY
HAZARDOUS WASTE DIVISION
P.O. BOX 44307
BATON ROUGE, LOUISIANA 70804

Form Approved OMB No. 2050-0039 Expires 9-30-91

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TXB49012075900498		2. Page 1 of 1		3. Information in the shaded areas is not required by Federal law.	
4. Generator's Name and Mailing Address Hercules Offshore Corporation 11011 Richmond Ave., Suite 500, Houston, Texas 77042				A. State Manifest Document Number LA 1174576			
5. Generator's Phone (713) 789-7983				B. State Generator's ID XXX07			
6. Transporter 1 Company Name Bealine Service Company		7. US EPA ID Number TXD980809859		C. State Transporter's ID 40421		D. Transporter's Phone 713/474-7772	
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter's ID		F. Transporter's Phone	
9. Designated Facility Name and Site Address Chemical Waste Management Rt. 2 John Brannon Rd. Corlyss, LA 70663		10. US EPA ID Number LAD000777201		G. State Facility's ID GDT -507-P		H. Facility's Phone 318/583-2169	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	1. Waste No.
a. RQ, Hazardous Waste Solid, n.o.s. ORM-E NA9189, (EPA- D004, D007, D008)				001	DT	26.54	T D008, D007, 978030
b.							
c.							
d.							
J. Additional Descriptions for Materials Listed Above OWM Profile # K44208 WSI Profile # JN0094				K. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information Hazardous material wear protective clothing when handling, gloves, goggles, and protective suit. If spilled in LA contact LADPS at 504/925-6595.							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. Or, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name E. K. Anderson				Signature <i>E. K. Anderson</i>		Month Day Year 01/21/90	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Mike Lanier				Signature <i>Mike Lanier</i>		Month Day Year 10/21/89	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name				Signature		Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 18. Printed/Typed Name							
Signature				Month Day Year			

EPA Form 8700-22 (Rev. 8/88) Previous edition is obsolete.

153 FACILITY MAIL TO DEPARTMENT OF ENVIRONMENTAL QUALITY

DEQ FORM HW-3 (R 8/88)

T&E 000257

STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY
HAZARDOUS WASTE DIVISION
P.O. BOX 44307
BATON ROUGE, LOUISIANA 70804

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMS No. 2060-0038. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TXP 49012075900316		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Hercules Offshore Corporation 11011 Richmond Ave., Suite 500, Houston, Texas 77042				A. State Manifest Document Number LA 1174555			
4. Generator's Phone (713) 789-7983				B. State Generator's ID XXX07			
5. Transporter 1 Company Name Bealine Service Company		6. US EPA ID Number TXD 980809899		C. State Transporter's ID 40621		D. Transporter's Phone 713/474-7772	
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter's ID		F. Transporter's Phone	
9. Designated Facility Name and Site Address Chemical Waste Management Rt 2 John Brammon Rd. Corylss, LA 70663		10. US EPA ID Number LAD 000777201		G. State Facility's ID GDT-507-P		H. Facility's Phone 318/583-2169	
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	1. Waste No.
a. RQ, Hazardous Waste Solid, n.o.s., ORM-E NA9189, (EPA - D004, D007, D008)				001	2016.8	T	D008, D004 D007 978030
b.							
c.							
d.							
J. Additional Descriptions for Materials Listed Above CWM # K44208 WSI # JN0094 Direct all questions concerning shipment to WSI at 713/820-6778.				K. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information Hazardous material wear protective clothing when handling, gloves, goggles and protective suit. If spilled in LA contact LADPS at 504/925-6595.							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name ED Anderson by J. Hogg				Signature ED Anderson by J. Hogg		Month Day Year 12 10 1990	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Alberto Martinez				Signature Alberto Martinez		Month Day Year 10 20 1990	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name				Signature		Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator. Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name							
Signature				Month Day Year			

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TX IP 4 2 0 1 2 0 7 5 2 0 1 0 2 9 7		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address Hercules Offshore Corporation 11011 Richmond Ave, Suite 500, Houston, Texas 77042				A. State Manifest Document Number LA 1174573							
4. Generator's Phone (713) 789-7983				B. State Generator's ID XXXX07							
5. Transporter 1 Company Name Bealine Service Company		6. US EPA ID Number TX ID 9 8 10 8 10 9 8 15 9		C. State Transporter's ID 40421		D. Transporter's Phone 713/474-7772					
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter's ID		F. Transporter's Phone					
9. Designated Facility Name and Site Address Chemical Waste Management Rt 2 John Brannon Rd. Corylss, LA 70663		10. US EPA ID Number LA ID 0 0 0 7 7 7 2 0 1		G. State Facility's ID GDT-507-P		H. Facility's Phone 318/583-2169					
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number) a. RQ, Hazardous Waste Solid, n.o.s., ORM-E NA9189, (EPA- D004, D007, D008) b. c. d.				12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
				0 0 1 D T		21.1		T		D008 D004, D007 978030	
16. Additional Descriptions for Materials Listed Above OWM Profile # K44208 WSI Profile # JN0094				K. Handling Codes for Wastes Listed Above							
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Printed/Typed Name E.R. Anderson				Signature <i>E.R. Anderson</i>		Month Day Year 06/11/91					
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Justin Shannon				Signature <i>Justin Shannon</i>		Month Day Year					
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name				Signature		Month Day Year					
19. Discrepancy Indication Space											
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name											

DEPARTMENT OF ENVIRONMENTAL QUALITY
HAZARDOUS WASTE DIVISION
P.O. BOX 44307
BATON ROUGE, LOUISIANA 70804

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0038. Expires 8-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TXP49012075900297		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Hercules Offshore Corporation 11011 Richmond Ave, Suite 500, Houston, Texas 77042				A. State Manifest Document Number LA 1174572			
4. Generator's Phone (713) 789-7983				B. State Generator's ID XXX07			
5. Transporter 1 Company Name Bealine Service Company		6. US EPA ID Number TXD980809859		C. State Transporter's ID 40421		D. Transporter's Phone 713/474-7772	
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter's ID		F. Transporter's Phone	
9. Designated Facility Name and Site Address Chemical Waste Management Rt 2 John Brannon Rd. Corlyss, LA 70663		10. US EPA ID Number LAD000777201		G. State Facility's ID GDT-507-P		H. Facility's Phone 318/583-2169	
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol	1. Waste No.
a. RQ, Hazardous Waste Solid, n.o.s., ORM-E NA9189, (EPA- D004, D007, D008)				2001 DIT	18	T	978030
b.							
c.							
d.							
J. Additional Descriptions for Materials Listed Above CWM Profile # K44208 WSI Project # JN0094				K. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information: Hazardous material wear protective clothing when handling, gloves, goggles and protective suit. If spilled in LA contact LADPS at 504/925-6595.							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this manifest are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to the which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name E.R. Anderson				Signature E.R. Anderson		Month Day Year 02/02/90	
17. Transporter 1 Acknowledgement of Receipt of Materials				Printed/Typed Name Justin Shannon		Signature Justin Shannon	
				Month Day Year 09/01/89			
18. Transporter 2 Acknowledgement of Receipt of Materials				Printed/Typed Name		Signature	
				Month Day Year			
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 18.							
Printed/Typed Name				Signature		Month Day Year	

EPA Form 8700-22 (Rev. 8/88) Previous edition is obsolete.

TSO FACILITY MAIL TO DEPARTMENT OF ENVIRONMENTAL QUALITY

DEO FORM HW-3 (R 8/88)

T & E 000260



Strength through experience, equipment, know-how

11011 Richmond Ave., Suite 500
Houston, Texas 77042

Office (713) 789-7983
Fax. (713) 789-4063

September 15, 1990

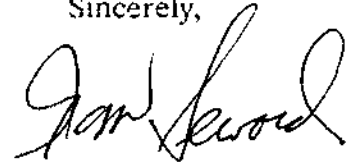
Mr. Bob Casale

Dear Bob:

It was a pleasure talking to you yesterday, and I am pleased to learn that you feel that we had a good summer in terms of Hercules' relationship with its neighbors. As I said, we have placed heavy emphasis on the matters previously discussed with particular emphasis on noise level, wind direction and sand blasting. Please be assured that to the extent that we are able to control these factors, we will make every effort to do so.

I look forward to meeting with you in person and will call you in advance of a trip to Freeport in the hope that we might be able to have lunch or breakfast. In the meantime, your input will continue to be of significance; so, please do not hesitate to contact me at any time.

Sincerely,

A handwritten signature in dark ink, appearing to read "Tom Seward", written in a cursive style.

Thomas J. Seward II

TJS/ljj

T&E000148



HERCULES
OFFSHORE CORPORATION

Strength through experience, equipment, know-how
11011 Richmond Ave., Suite 500
Houston, Texas 77042

Office (713) 789-7983
Fax (713) 789-4063

RECEIVED

SEP 27 1990

DISTRICT 7

September 26, 1990

Mr. Ata ur Rahman
Southeast Region
Texas Water Commission
5144 East Sam Houston Parkway North
Houston, TX 77015

RECEIVED

NOV 26 1990

DISTRICT 7

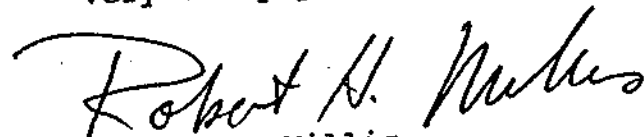
RE: Hercules Offshore Corporation
Lettie Street Facility Cleanup
(Former leased facility vacated 01/20/89)
Houston, Texas
TWC Registration No. 30141

Dear Mr. Rahman:

Attached are interim analysis which we used to determine if we had removed sufficient soil in what appeared to be questionable areas. Area 5A was excavated further. Area 5 was scraped to the paving underneath which is limestone and asphalt.

Please call me if you have any questions or require further work by us.

Very truly yours,


Robert H. Millis

RHM/ljj

Attachments

T&E 000277

M.B.A. LABS
MICROBIOLOGICAL AND BIOCHEMICAL
ASSAY LABORATORIES

P.O. BOX 9461

340 S. 66th STREET

HOUSTON, TEXAS 77261

TELEPHONE NO. (713)928-2701

FAX NO. (713)928-9063

SAMPLE SUBMITTED BY: Southtec Services
DATE RECEIVED: 7-9-1990
DATE COMPLETED: 7-12-1990
LABORATORY REPORT NUMBER: J-29220-00
SAMPLE IDENTIFICATION: Soil Sample # P2 in Ditch \approx Area #1

RESULTS

PARAMETER	METHOD #	DATE	TIME	ANALYST	RESULT
Total Petroleum Hydrocarbons	SM 503 E	7-10-90	2:00	G.J.	80 mg/kg

Reported By: _____

Joe Kusse
cm

T&E 000279

M.B.A. LABS

340 S. 66th STREET

HOUSTON, TEXAS 77261

FAX NO. (713)928-9063

SAMPLE SUBMITTED BY: Southtec Services

DATE RECEIVED: 7-9-1990

DATE COMPLETED: 7-12-1990

LABORATORY REPORT NUMBER: J-29221-00

SAMPLE IDENTIFICATION: Soil Sample # P3 \cong Area 5

RESULTS

PARAMETER	METHOD #	DATE	TIME	ANALYST	RESULT
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Total Petroleum Hydrocarbons	SM 503 E	7-10-90	2:00	G.J.	3782 mg/kg
------------------------------	----------	---------	------	------	------------

Reported By: Joe Kiser

Om

T&E 000280

M.B.A. LABS
MICROBIOLOGICAL AND BIOCHEMICAL
ASSAY LABORATORIES

P.O. BOX 9461

340 S. 66th STREET

HOUSTON, TEXAS 77261

TELEPHONE NO. (713)928-2701

FAX NO. (713)928-9063

SAMPLE SUBMITTED BY: Southtec Services
DATE RECEIVED: 7-9-1990
DATE COMPLETED: 7-12-1990
LABORATORY REPORT NUMBER: J-29218-00
SAMPLE IDENTIFICATION: Soil Sample # P4 = *Arco 5A*

RESULTS

PARAMETER	METHOD #	DATE	TIME	ANALYST	RESULT
Total Petroleum Hydrocarbons	SM 503 E	7-10-90	2:00	G.J.	27826mg/kg

Reported By: *Joe Kresse*
cm

T&E 000281



HERCULES

OFFSHORE CORPORATION

Strength through experience, equipment, know-how

11011 Richmond Ave., Suite 500
Houston, Texas 77042

Office (713) 789-7983
Fax (713) 789-4063

RECEIVED

SEP 27 1990

DISTRICT 7

September 26, 1990

Mr. Ata ur Rahman
Southeast Region
Texas Water Commission
5144 East Sam Houston Parkway North
Houston, TX 77015

RECEIVED

NOV 26 1990

DISTRICT 7

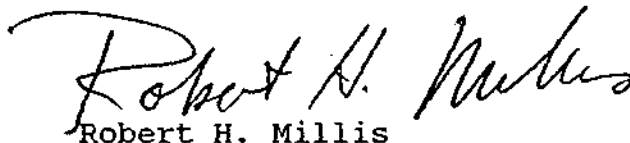
RE: Hercules Offshore Corporation
Lettie Street Facility Cleanup
(Former leased facility vacated 01/20/89)
Houston, Texas
TWC Registration No. 30141

Dear Mr. Rahman:

Attached are interim analysis which we used to determine if we had removed sufficient soil in what appeared to be questionable areas. Area 5A was excavated further. Area 5 was scraped to the paving underneath which is limestone and asphalt.

Please call me if you have any questions or require further work by us.

Very truly yours,


Robert H. Millis

RHM/ljj

Attachments

T&E 000294

M.B.A. LABS
MICROBIOLOGICAL AND BIOCHEMICAL
ASSAY LABORATORIES

P.O. BOX 9461

340 S. 66th STREET

HOUSTON, TEXAS 77261

TELEPHONE NO. (713) 928-2701

FAX NO. (713) 928-9063

SAMPLE SUBMITTED BY: Southtec Services
DATE RECEIVED: 7-9-1990
DATE COMPLETED: 7-12-1990
LABORATORY REPORT NUMBER: J-29219-00
SAMPLE IDENTIFICATION: Soil Sample # P1 = *Arco #2*

RESULTS

PARAMETER	METHOD #	DATE	TIME	ANALYST	RESULT
Total Petroleum Hydrocarbons	SM 503 E	7-10-90	2:00	G.J.	77 mg/kg

Reported By: _____

Joe Kuesse
cm

T&E 000295

M.B.A. LABS
MICROBIOLOGICAL AND BIOCHEMICAL
ASSAY LABORATORIES

P.O. BOX 9461

340 S. 66th STREET

HOUSTON, TEXAS 77261

TELEPHONE NO. (713)928-2701

FAX NO. (713)928-9063

SAMPLE SUBMITTED BY: Southtec Services
DATE RECEIVED: 7-9-1990
DATE COMPLETED: 7-12-1990
LABORATORY REPORT NUMBER: J-29220-00
SAMPLE IDENTIFICATION: Soil Sample # P2 in Ditch \approx Area #1

RESULTS

PARAMETER	METHOD #	DATE	TIME	ANALYST	RESULT
Total Petroleum Hydrocarbons	SM 503 E	7-10-90	2:00	G.J.	80 mg/kg

Reported By: _____

Joe Kusse
cm

T&E 000296

M.B.A. LABS
MICROBIOLOGICAL AND BIOCHEMICAL
ASSAY LABORATORIES

P.O. BOX 9461

340 S. 66th STREET

HOUSTON, TEXAS 77261

TELEPHONE NO. (713)928-2701

FAX NO. (713)928-9063

SAMPLE SUBMITTED BY: Southtec Services
DATE RECEIVED: 7-9-1990
DATE COMPLETED: 7-12-1990
LABORATORY REPORT NUMBER: J-29221-00
SAMPLE IDENTIFICATION: Soil Sample # P3 \approx Area 5

RESULTS

PARAMETER	METHOD #	DATE	TIME	ANALYST	RESULT
Total Petroleum Hydrocarbons	SM 503 E	7-10-90	2:00	G.J.	3782 mg/kg

Reported By: Joe Kusse
 cm

T&E 000297

M.B.A. LABS
MICROBIOLOGICAL AND BIOCHEMICAL
ASSAY LABORATORIES

P.O. BOX 9461

340 S. 66th STREET

HOUSTON, TEXAS 77261

TELEPHONE NO. (713)928-2701

FAX NO. (713)928-9063

SAMPLE SUBMITTED BY: Southtec Services
DATE RECEIVED: 7-9-1990
DATE COMPLETED: 7-12-1990
LABORATORY REPORT NUMBER: J-29218-00
SAMPLE IDENTIFICATION: Soil Sample # P4 = Area 5A

RESULTS

PARAMETER	METHOD #	DATE	TIME	ANALYST	RESULT
Total Petroleum Hydrocarbons	SM 503 E	7-10-90	2:00	G.J.	27826mg/kg

Reported By: _____

Joe Kresse
cm

T&E 000298